

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: : Chapter 7
GLORIA BELLO BASSEY :
Debtor : Case no: 23-53017-wlh

AL TADAMON NATIONAL :
COMPANY FOR GENERAL :
TRADING & CONTRACTING CO., :
Plaintiff : Adversary Proceeding No: 23-05107-wlh
vs :
GLORIA BELLO BASSEY, :
Defendant

ANSWER & DEFENSES

COMES NOW, Gloria Bello Bassey, Defendant in the above-styled matter and states her answer to Plaintiffs' Complaint as follows:

ANSWER

Jurisdiction and Venue

1. Defendant admits the allegations contained in paragraph one of the Complaint.
2. Defendant admits the allegations contained in paragraph two of the Complaint.
3. Defendant admits the allegations contained in paragraph three of the Complaint.
4. Defendant admits the allegations contained in paragraph four of the Complaint.
5. Defendant admits the allegations contained in paragraph five of the Complaint.

Background

6. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph six of the Complaint. Therefore, the allegations contained therein are denied.
7. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph seven of the Complaint. Therefore, the allegations contained therein are denied.
8. Defendant admits the allegations contained in paragraph eight of the Complaint.
9. Defendant admits the allegations contained in paragraph nine of the Complaint.
10. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph ten of the Complaint. Therefore, the allegations contained therein are denied.
11. Defendant denies the allegations contained in paragraph eleven of the Complaint.
12. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph twelve of the Complaint. Therefore, the allegations contained therein are denied.
13. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph thirteen of the Complaint. Therefore, the allegations contained therein are denied.
14. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph fourteen of the Complaint. Therefore, the allegations contained therein are denied.

15. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph fifteen of the Complaint. Therefore, the allegations contained therein are denied.

16. Defendant denies the allegations contained in paragraph sixteen of the Complaint.

17. Defendant denies the allegations contained in paragraph seventeen of the Complaint.

18. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph eighteen of the Complaint. Therefore, the allegations contained therein are denied.

19. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph nineteen of the Complaint. Therefore, the allegations contained therein are denied.

20. Defendant denies the allegations contained in paragraph twenty of the Complaint.

The Litigation

21. Defendant admits the allegations contained in paragraph twenty-one of the Complaint.

22. Defendant admits the allegations contained in paragraph twenty-two of the Complaint.

Count 1 (11 U.S.C 523(a)(2)(A))

23. Defendant incorporates and restates her responses to paragraphs 1 through 22 as if fully set forth herein.

24. Defendant denies the allegations contained in paragraph twenty-four of the Complaint.

25. Defendant denies the allegations contained in paragraph twenty-five of the Complaint.

26. Defendant denies the allegations contained in paragraph twenty-six of the Complaint.

27. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph twenty-seven of the Complaint. Therefore, the allegations contained therein are denied.

28. Defendant denies knowledge or information sufficient as to form a belief regarding the allegations contained in paragraph twenty-eight of the Complaint. Therefore, the allegations contained therein are denied.

29. Defendant denies the allegations contained in paragraph twenty-nine of the Complaint.

30. Defendant denies the allegations contained in paragraph thirty of the Complaint.

Count II
(11 U.S.C. 523(a)(4))

31. Defendant incorporates and restates her responses to paragraphs 1 through 30 as if fully set forth herein.

32. Defendant denies the allegations contained in paragraph thirty-two of the Complaint.

33. Defendant denies the allegations contained in paragraph thirty-three of the Complaint.

34. Defendant denies the allegations contained in paragraph thirty-four of the Complaint.

35. Defendant denies the allegations contained in paragraph thirty-five of the Complaint.

Count III
(11 U.S.C. 523(a)(6))

36. Defendant incorporates and restates her responses to paragraphs 1 through 35 as if fully set forth herein.

37. Defendant denies the allegations contained in paragraph thirty-seven of the Complaint.

38. Defendant denies the allegations contained in paragraph thirty-eight of the Complaint.

39. Defendant denies the allegations contained in paragraph thirty-nine of the Complaint.

40. Defendant denies the allegations contained in paragraph forty of the Complaint.

41. Defendant denies the allegations contained in paragraph forty-one of the Complaint.

DEFENSES

42. Plaintiff's complaint fails to state a claim upon which relief can be granted (Count I).

43. Plaintiff's complaint fails to state a claim upon which relief can be granted (Count II).

44. Plaintiff's complaint fails to state a claim upon which relief can be granted (Count III).

45. Regarding the Litigation in Florida:

- a. The Florida court lacked jurisdiction over the Defendant.
- b. Service was improper in Florida.
- c. Service of Process was improper in Florida.

WHEREFORE, Defendant prays:

- a) That Plaintiff's Complaint be dismissed.
- b) That Plaintiff's claims be denied.
- c) That Defendant be granted such other and future relief as the Court deems just and proper.

This 25th day of September 2023.

Respectfully submitted,

/s/Ian M. Falcone
Ian M. Falcone
GA Bar No. 254470
Attorney For Gloria Bassey

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IN RE:	:	Chapter 7
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	:	Case no: 23-53017-wlh
Debtor	:	
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AL TADAMON NATIONAL	:	
COMPANY FOR GENERAL	:	
TRADING & CONTRACTING CO.,	:	
	:	
Plaintiff	:	Adversary Proceeding No: 23-05107-wlh
	:	
v	:	
	:	
GLORIA BELLO BASSEY,	:	
Defendant	:	

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing “ANSWER” using the Bankruptcy Court’s Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court’s Electronic Filing program:

Michael J. Bargar, Trustee
mbargar@rlkglaw.com

G. Frank Nason, IV
fnason@lcnlaw.com

This 25th day of September 2023

/s/ IAN M. FALCONE
Ian M. Falcone
Attorney for Gloria Bassey
Georgia Bar No. 254470

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